

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Robert F. Mansure, : Chapter 13  
Debtor : Case No. 19-10779-amc

**OBJECTION TO CONFIRMATION**

The Delaware County Tax Claim Bureau moves that the Debtors' Chapter 13 Plan be denied confirmation pursuant to 11 U.S. C. Section 1322, 1324, and 1325(a)(5), and in support thereof states:

1. The Debtors filed a petition seeking relief under Chapter 13 of the Bankruptcy Code on February 7, 2019.
2. The Delaware County Tax Claim Bureau filed Proof of Claim No. 1 on April 1, 2019 for the 2017-2018 delinquent real estate taxes for 227 E. Greenwood Ave, Lansdowne Pennsylvania, bearing folio number 16-02-00828-00, listed as a secured claim in the amount of \$12,680.02 with interest at the rate of 9% on the entire claim. A true and correct copy of the Proof of Claim is attached hereto, made a part hereof and marked as Exhibit "A."
3. The Debtors filed a Chapter 13 Plan on December 26, 2018. A true and correct copy of the Plan is attached hereto, made a part hereof and marked as Exhibit "B."
4. The Chapter 13 Plan fails to pay the Delaware County Tax Claim Bureau's secured claim as required by 11 U.S.C. § 1325(a) (5).
5. The Delaware County Tax Claim Bureau objects to the Confirmation of Debtors' Chapter 13 Plan. 11 U.S.C. § 1324.
6. The Debtors have failed to file an Amended Chapter 13 Plan to pay the Delaware County Tax Claim Bureau's secured claim in full as required by 11 U.S.C. § 1325(a).

**WHEREFORE**, the Tax Claim Bureau of Delaware County requests that confirmation of the Debtors' Plan be denied.

Respectfully submitted:

**TOSCANI & GILLIN, P.C.**

**Dated:** April 1, 2019

/s/ Leonard B. Altieri, III  
Leonard B. Altieri, III, Esquire  
Attorney for the Delaware County  
Tax Claim Bureau  
230 N. Monroe Street  
Media, PA 19063  
P (610) 565-2211  
F (610) 565-1846  
[Laltieri@toscanigillin.com](mailto:Laltieri@toscanigillin.com)